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10 Attorneys for Plaintiff, Matthew Alexander,  
11 for himself and other members of the general  
12 public similarly situated

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 Matthew Alexander, ) Docket No. 2:13-cv-02005-LDG-CWH  
16 Plaintiff, )  
17 vs. )  
18 GNLV, Corp. ) **PLAINTIFF'S MOTION TO**  
19 GNL, Corp., ) **FILE UNDER SEAL**  
20 Defendants. ) **PLAINTIFF MATTHEW**  
21 ) **ALEXANDER'S MEMORANDUM IN**  
22 ) **SUPPORT OF HIS MOTION TO**  
23 ) **COMPEL**  
24 )  
25 )  
26 )  
27 )  
28 )

29 Plaintiff Matthew Alexander, for himself and other members of the general public  
30 similarly situated, by and through undersigned counsel hereby moves the Court for an entry of an  
31 Order to file under seal Plaintiff Matthew Alexander's Memorandum in Support of His Motion  
32 to Compel. As support for this Motion, Plaintiff states as follows:

1       1. The parties have agreed to abide by the terms of a proposed protective order, until  
2 such time as the parties seek and receive an Order from the Court stating otherwise or the parties  
3 come to a different agreement.

4       2. Pursuant to the terms of the proposed protective order, parties that produce  
5 documents and/or provide deposition testimony in this litigation are permitted to designate their  
6 documents or deposition transcripts as “Confidential”, “Confidential – Attorney’s Eyes Only” or  
7 “Confidential Personal Information.”

8       3. Defendants have produced documents and/or deposition transcripts as  
9 Confidential, Confidential – Attorney’s Eyes Only or Confidential Personal Information.

10       4. Plaintiff is filing a Memorandum in Support of His Motion to Compel Deposition  
11 which contains information designated as Confidential, Confidential – Attorney’s Eyes Only or  
12 Confidential Personal Information. In order to comply with the terms of the proposed protective  
13 order, Plaintiff requests that the Court allow Plaintiff’s Memorandum to be filed under seal.

14       5. Plaintiff believes that the burden is on the Defendants to establish that the  
15 information designated as Confidential, Confidential – Attorney’s Eyes Only or Confidential  
16 Personal Information pursuant to the agreement is entitled to heightened protection. Nonetheless,  
17 Plaintiff requests that the Court file under seal Plaintiff Matthew Alexander’s Memorandum in  
18 Support of His Motion to Compel so that Plaintiff can comply with the parties’ agreement.

19       6. Accordingly, Plaintiff respectfully requests that the Court enter an Order filing  
20 Plaintiff Matthew Alexander’s Memorandum in Support of His Motion to Compel under seal.

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27       ...  
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1 Dated: October 24, 2014

**STUEVE SIEGEL HANSON LLP**

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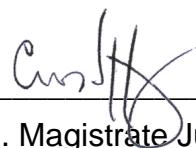
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18  
19 Attorneys for Plaintiff, Matthew Alexander,  
20 for himself and other members of the general  
public similarly situated

21 **ATTORNEYS FOR PLAINTIFFS**

22  
23 **ORDER**

24 It is so ordered.

25  
26  
27   
28 U.S. Magistrate Judge

Dated: 10/27/2014

## **CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on October 24, 2014, a copy of the foregoing document was served via email to the following:

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